

**Before the
Federal Communications Commission
Washington, DC 20554**

In the Matter of

QUALCOMM Incorporated

Petition for Declaratory Ruling

WT Docket No. 05-7

REPLY TO COMMENTS OF PAPPAS SOUTHERN CALIFORNIA LICENSE, LLC.

QUALCOMM Incorporated hereby replies to the Comments filed by Pappas Southern California, LLC (“Pappas”) in the above-captioned matter. In these Comments, Pappas supports the views expressed in the Petition for Reconsideration and Clarification (“Petition”) of the Association for Maximum Service Television, Inc. (“MSTV”).

Pappas merely parrots the meritless arguments raised by MSTV in its Petition. These arguments were thoroughly rebutted by QUALCOMM in its Opposition filed on November 21, 2006. Thus, there is no need to respond separately to the Comments filed by Pappas.

Respectfully submitted,

QUALCOMM Incorporated

By _____ /s/
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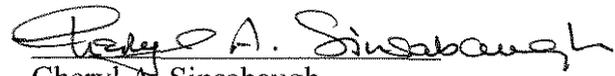
Dated: November 27, 2006

CERTIFICATE OF SERVICE

I, Cheryl Sinsabaugh, do hereby certify that on the 27th day of November 2006, I forwarded to the parties listed below a copy of the foregoing Reply to Comments of Pappas Southern California License, LLC:

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